Case 1:13-mc-00125-P1 Document 1

PREET BHARARA
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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

STIPULATION AND RELEASE

- V -

Asset ID 12-DEA-572240

: DEA Case C1-12-0273

\$3,328.00 IN UNITED STATES CURRENCY,

13 Misc.

Defendant-in-rem.

WHEREAS, on or about September 10, 2012, Courtney Wright ("Wright") was arrested by the Drug Enforcement Administration ("DEA");

WHEREAS, on or about September 10, 2012, \$3,328.00 in United States Currency (the "Defendant-in-rem") was seized by the DEA from Wright;

WHEREAS, on or about January 9, 2013, Wright filed a claim for the Defendant-in-rem, asserting ownership therein; and

WHEREAS, the United States of America (the "Government") has determined that it will not file a civil complaint for the forfeiture of the Defendant-in-rem,

IT IS HEREBY STIPULATED AND AGREED:

- The Defendant-in-rem shall be returned to the Claimant, Wright.
- 2. Wright is hereby barred from asserting any claims against the Government, the DEA, or agents and employees of the Government and the DEA (including any federal or state law enforcement officers acting in conjunction with agents of the DEA in effecting the arrest of Wright or the seizure of the Defendant-in-rem) (the "released parties") in connection with the seizure and/or possession of the Defendant-in-rem, including but not limited to any claim that there was no probable cause to seize and hold the Defendant-in-rem.
- 3. Wright further agrees to hold harmless the released parties from any and all claims arising from any acts, incidents, or occurrences in connection with the seizure and/or possession of the Defendant-in-rem, including but not limited to any third-party claims of ownership of the Defendant-in-rem.

- Each party to this Stipulation and Release shall bear 4. its own costs and attorney fees.
- This Stipulation may be executed in counterparts, each of which shall be deemed an original, and all of which, when taken together, shall be deemed the complete Stipulation.
- 6. This Stipulation and Release constitutes the complete agreement between the parties hereto and may not be amended except by written consent thereof.

Dated: New York, New York April &, 2013

PREET BHARARA United States Attorney for the Southern District of New York Attorney for Plaintiff

Paul M. Monteleoni

Assistant United States Attorney

One St. Andrew's Plaza New York, New York 10007

(212)637-2219

k, New York 2013

Courtney Wright

937 E. 223rd Street, Second Floor

Bronx, NY 10466

SO ORDERED:

STATES MAGISTRATE JUDGE SOUTHERN DISTRICT OF NEW YORK

Date: 4.10.13